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February 27, 2020

Re: *Jane Doe 1-10 v. Baylor University*; Cause No. 6:16-cv-173-RP; In the United States District Court, Western District of Texas, Waco Division

PLAINTIFFS' PROPOSED MODIFIER FOR "TITLE IX"

Judge Austin,

As requested by ECF 806, Plaintiffs propose the following modifier to limit the search hits for the term "Title IX". The modification excludes documents where "title ix" is found only in a signature block. The word "clifton" is used in all signature blocks of Title IX personnel as it is part of the address of the Title IX office.

Term	Proposed Modifier	Proposed Modifier Search
"title ix"	to exclude "title ix" when it appears in a signature block only.	"("title ix"-"clifton ("title ix")"~4)"

Respectfully,

/s/Jim Dunnam

Jim Dunnam

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been filed by ECF and sent to counsel of record via electronic notification on February 27, 2020.

/s/Jim Dunnam

JIM DUNNAM